



August 1, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RM-11791

Dear Ms. Dortch;

SmartBurst LLC. is a fixed wireless Internet service provider (WISP) delivering high-speed Internet access to homes and businesses in North Texas and we are committed to providing fixed wireless access to more Americans.

Based in Aubrey, TX and founded in 2005 in order to provide fast reliable internet services, our service area in rural North Texas includes the Counties of Denton, Cooke, and Grayson as well as a few homes and businesses in the towns of Aubrey, Denton, Pilot Point, Sanger, Whitesboro, Collinsville, Valley View, Tioga and is actively expanding into other communities in the area. Currently the SmartBurst Internet service area is 413 square miles and the population within that area numbers nearly 35,000. Almost all of our customers are rural in nature and only a few are located in the incorporated areas or towns mentioned. We offer speeds up to 15/5 Mbps and would like to offer much faster options, however part of the challenge is we utilize crowded unlicensed spectrum that must be shared with other users. Additionally most of our equipment is deployed in the 5.1-5.8 GHz band which is not useful for users blocked by terrain or vegetation. In July alone we had requests for service to a dozen homes we could not provide service to because of this problem. It is also restricted in power and range due to various emission restrictions and sharing with radar and other users. We have invested in and deployed equipment in the 3.65 GHz band, however the continued viability of the use of that spectrum is now in question with a recent petition by the CTIA and T Mobile. The other bands we use only serve about 10% of our customers those being the 2.4 GHz and 900 MHz bands which are too wrought with interference from other unlicensed devices and are inadequate in allocation size to offer much more than 5-10 Mbps to most users.

A reasonable solution to these challenges is the petition for access to 500 Mhz of low cost spectrum SPECIFICALLY FOR FIXED WIRELESS deployment in the 3.7 – 4.2 Ghz band. We enthusiastically support this petition and if we had access to just 80-100 MHz in our service area we would be capable of offering speeds starting at 50/10Mbps! Access to this underutilized spectrum would allow us to deploy to hundreds of customers in our service area that are now denied coverage due to terrain, vegetation, interference or other frequency coordination restrictions. Investing in LTE technology in this band is a further solution to many homes and businesses that are currently denied faster speeds or any service at all.

Existing customers are demanding increasing amounts of bandwidth. Their habits are changing from relying on satellite or cable TV for their information and entertainment while school

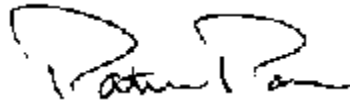
P.O. Box 677 Aubrey, TX 76227
940-239-0885

children in many school districts in our area demand reliable and faster internet access for lesson plans while many potential customers have either no choice or only one provider available.

Purchasing spectrum at auction would be prohibitive for us. Fixed wireless technology in a lightly licensed scenario however is a cost effective way for us to deploy faster and more reliable broadband to homes and businesses in our area.

Millions of American citizens living in rural and underserved areas served by small providers like SmartBurst must be afforded the same opportunity to receive fast, dependable Internet services, therefore we support the Broadband Access Coalition 3.7 GHz Band Petition for Rulemaking and we encourage the Commission to move ahead quickly to issue a Notice of Proposed Rulemaking in the matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick Parks", with a stylized, cursive script.

Patrick Parks
President
SmartBurst LLC